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VIA FACSIMILE

August 12, 1996

Damaris Cristiano, Esq.
Assistant Regional Counsel
U.S. Environmental Protection Agency
Region II
290 Broadway, 17th Floor
New York, New York 10007

PRIVILEGED AND CONFIDENTIAL SETTLEMENT COMMUNICATION

Re: 216 Paterson Plank Road, Carlstadt, New Jersey ("SCP") Sequa Corporation on Behalf of Arrow Group Industries -- SUPPORTING CERTIFICATION.

Dear Ms. Cristiano:

As discussed in the letter dated August 9, 1996, attached is a copy of the Certification of L. Pasculli, Esq., Director of Environmental Law, Sequa Corporation ("Sequa"). The purpose of this Certification is to clarify the corporate relationship between Sequa and Arrow Group Industries ("Arrow") so that it will be clear that Sequa is the appropriate entity to assume the liability for Arrow in this matter. Upon my receipt of the original Certification, I will forward a new set of the entire de minimis settlement submission on behalf of Sequa via Federal Express.

Please contact me immediately should you need any further information.

Thank you for your attention to this matter.

Very truly yours,

Eletha L. Duffy

Eletha L. Duffy

cc: L. P. Pasculli, Esq.
R. Puvogel
S. B. Watson, Esq.
E. Yu, Esq.


Enclosures: (1)

598832



CERTIFICATION

1. I, Leonard P. Pasculli, am the Director of Environmental Law of Sequa Corporation ("Sequa"). I make this certification in connection with Sequa's settlement in the Matter of Scientific Chemical Processing Site, Carlstadt, New Jersey.
2. Arrow Group Industries ("Arrow") was a subsidiary of Chromalloy American Corporation ("Chromalloy"). Upon Chromalloy's sale of the assets of Arrow in 1981, Chromalloy retained certain liabilities of Arrow, including those relevant to this matter.
3. In December, 1986, Sun Chemical Corporation ("Sun") merged with Chromalloy. By operation of law, Sun assumed responsibility for Chromalloy's liabilities, including those related to Arrow.
4. In May, 1987, Sun changed its name to Sequa Corporation.
5. It is because of these corporate relationships that Sequa now responds on behalf of Arrow in this matter.
6. The foregoing statements made by me are true to the best of my knowledge, information and belief. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

 8/12/96
Leonard P. Pasculli, Esq.
Director, Environmental Law
Sequa Corporation

ELETHA DUFFY,
ESQUIRE

1138-H Easton Avenue, Somerset, NJ 08873

FAX

~~8/12/96~~

Resend on 8/13

Number of pages including cover sheet:

3

To:

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CC:

From:

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REMARKS:

☐

Urgent

☐

For your review

☐

Reply ASAP

☐

Please comment